NEW YORK CITY SCHOOL
CONSTRUCTION AUTHORITY

April 2, 2020

Mr. Peter Lopez
Regional Administrator
United States Environmental Protection Agency, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866

RE: Notification of Self-Implementing Onsite Cleanup and Disposal of PCB Remediation Waste
New York City School Construction Authority
Public School 68X, 4011 Monticello Ave, Bronx, New York 10466
LLW #: 121877; IEH Service ID #: 76969

Dear Mr. Lopez:

The New York City School Construction Authority (NYCSCA) has prepared this Notification Letter in accordance with 40 CFR Part 761.61(a)(3) for the remediation of soil at Public School 68X (P.S. 68X) at 4011 Monticello Avenue, Bronx, New York.

Polychlorinated Biphenyls (PCBs) have been found in soils adjacent to the P.S. 68X school building. The source of contamination is likely from any number of historical activities such as deterioration of exterior PCB caulk or possibly from other unidentified sources that we are not aware of. The NYCSCA is not planning to perform any additional exterior renovation work that may disturb caulk/sealants at P.S. 68X at this time.

The PCB contamination in the soil was identified during an investigation undertaken by ATC Group Services, LLC (ATC) at the direction of NYCSCA. This investigation was performed in consideration of the New York State Education Department (SED) protocol for addressing PCBs in caulking material in school buildings that were constructed or renovated between 1950 and 1977 and that are currently undergoing renovation or demolition. The surface soil investigation activities and results are presented in the *Surface Soil Investigation Report for P.S. 68X* prepared by ATC and dated February 17, 2020, and incorporated into this Notification Letter by reference, where necessary.

The NYCSCA will coordinate all PCB renovation activities at P.S. 68X including activities related to the remediation of PCB-impacted soils adjacent to the subject building.

This Notification Letter provides a summary of the following information in accordance with 40 CFR Part 761.61(a), with reference to the *Surface Soil Investigation Report for P.S. 68X* prepared by ATC where necessary:

- Background information regarding the site and source of PCB contamination;
- Soil investigation procedures and methodologies;
- Soil investigation results, location and extent of PCB-impacted areas;
- Cleanup plan, including schedule, approach, and contingency options to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found or other obstacles force changes in the cleanup approach; and,
- Written certification by NYCSCA regarding the availability of all required information for US Environmental Protection Agency (EPA) inspection (included at the end of this Notification Letter).

Background

In June 2007, the SED published a protocol for addressing PCBs in caulking material in school buildings that were constructed or renovated between 1950 and 1977 and that are currently undergoing renovation or demolition. This protocol was developed in consultation with the New York State Department of Health (DOH) to address concerns about properly managing caulk containing PCBs that may be disturbed during building renovation or demolition. The NYCSCA is providing to the EPA, as part of this notification, the results of the pre-construction survey work conducted at this school that indicates the location and concentration of PCB-containing caulk that were anticipated to be disturbed during the renovation project. The guidelines also include developing a soil sampling plan, and sampling and testing of soils that may have been impacted by the disturbance of PCB caulk during the renovation or demolition projects, if applicable.

On October 11 2019, ATC, at the direction of NYCSCA and in consideration of the SED protocol, visually assessed the condition of exterior caulk and soils at P.S. 68X. There was no visible evidence of suspect PCB-containing material observed on the exterior soils or paved areas within 25 feet of the building.

ATC performed the surface soil investigation at P.S. 68X on November 1 and December 4, 2019 and January 3, 2020. Surface soil samples were collected adjacent to the school building along the eastern, western and southern façades. The surface soil investigation was performed after the PCB caulk identified during the pre-construction survey was removed and construction activities on the project were complete. The NYCSCA is not aware of any additional PCB caulk present that could re-contaminate the soil.

Additional details and results of ATC's sampling of surface soils are presented in their *Surface Soil Investigation Report for P.S. 68X.*

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Soil Investigation Procedure

Surface soil sampling was performed by ATC on November 1 and December 4, 2019 and January 3, 2020. A total of one hundred and fifty (150) surface soil samples, including eleven (12) duplicate samples, were collected at a depth of 0 to 2 inches below ground surface (bgs), including the root zone but excluding the vegetative layer, using dedicated sampling equipment.

Surface soil samples were collected approximately every twenty (20) feet at intervals of 0.5', 3', 8', 10', 12', 14', 16', 18', and 20' distance from the building façade at a depth of 0-2" below ground surface (bgs). If any sample result in the interval exceeded 1 ppm of total PCBs (i.e., the EPA standard for no further action and the New York State Department of Environmental Conservation [NYSDEC] guideline concentration for PCBs in soil), the samples in the next interval were analyzed. A total of one-hundred and twenty-seven (127), including eight (8) duplicate samples, of the one hundred and fifty (150) soil samples collected were analyzed for total PCBs.

Soil Investigation Results

The results of the surface soil investigation indicated the presence of PCBs in surface soils above the EPA standard of 1 part per million (ppm) adjacent to the school building along the western and southern façades.

PCB concentrations did not exceed 50 ppm in any of the surface soil samples collected.

Cleanup Plan

The NYCSCA proposes excavating soil in areas where the surface soil investigation found PCB concentrations $\geq$ 1 ppm. The initial excavation will extend out from the building façade to the proposed limits shown on Figure 2 of the *Surface Soil Investigation Report for P.S. 68X* and to a minimum depth of two (2) feet. Post-excavation samples will be collected at the base and along the centerline of the excavation every twenty (20) feet and along the side wall every twenty (20) feet, at a depth of 0 to 2 inches below the vegetative layer but including the root zone.

When the laboratory analytical results of post-excavation soil samples show PCB concentrations < 1 ppm, then no further excavation will be required. If a base post-excavation sample result contains $\geq$ 1 ppm PCBs, the excavation will be expanded down another one foot, unless further excavation is prevented by a subsurface structure (e.g. foundation). If a side wall post-excavation sample result contains $\geq$ 1 ppm PCBs, the excavation will be expanded laterally an additional one foot.

This excavation procedure will generally continue until all post-excavation samples are < 1 ppm of total PCBs, so that no future restrictions on the site will be required. Material which meets the EPA clean backfill standard (40 CFR 761.125 (c)(4)(v) and 40 CFR 761.125 (b)(1)(ii)) will be used to backfill the excavated areas. If site conditions do not allow the excavation of all soils identified with PCB concentrations $\geq$ 1 ppm (but less than

10 ppm), NYCSCA proposes a contingency consisting of: excavating impacted areas to a depth of two (2) feet or more; backfilling and properly compacting with low permeability material meeting the requirements of 40 CFR 761.61(a)(7); topping off any remaining depth of the excavation with environmentally clean fill material, including topsoil; and re-vegetating the surface of the backfilled area.

Any area where PCB concentrations are ≥ 1 ppm after excavation and backfilling will be included in a deed restriction in accordance with 40 CFR 761.61(a)(8) and applicable state and local regulations.

A proposed excavation plan showing the approximate excavation limits is included in Figure 2 of the *Surface Soil Investigation Report for P.S. 68X* prepared by ATC. These excavation limits may be amended, as necessary, based on the results of the post-excavation sampling that will be performed.

In summary, based on a review of the surface soil sample results and the post-excavation samples that will be collected, the plan will be to either:

- Excavate the PCB-impacted areas to a minimum depth of two (2) feet below ground surface (bgs) until the analytical results of the final post-excavation samples indicate PCB concentration are < 1 ppm and then backfill the excavated area with environmentally clean fill material, or;

- Excavate the PCB-impacted areas to a minimum depth of two (2) feet bgs until the PCB concentrations are below 10 ppm and then backfill the excavation with low permeability material meeting the requirements of 40 CFR 761.61(a)(7) and obtain deed restriction if PCB-impacted soil (greater than 1 ppm) remain in place.

If an area is excavated to a depth where no further excavation can be done and PCB concentrations are greater than 10 ppm in post excavation samples, the EPA will be contacted to discuss alternate courses of action.

Where PCBs greater than or equal to 1 ppm extend, in certain locations, to areas where the soil is adjacent to non-soil areas such as a concrete sidewalk, NYCSCA will excavate two (2) feet bgs up to the edge of the sidewalk. End-point post-excavation sidewall samples will be collected in the exposed soil interface below the concrete sidewalk and subsurface gravel layers. If any end-point post-excavation sidewall sample exceeds 1 ppm PCBs, NYCSCA will excavate the impacted exposed soil as long as the structural integrity of the sidewalk or other structure is not jeopardized. Site restoration will include backfilling the excavation with soil and any new gravel needed to replace what may be inadvertently removed from under the sidewalk during the excavation. The excavated soil and gravel will be disposed of as a PCB Remediation Waste.

During remediation activities, the excavated material will be loaded directly into trucks or roll-off containers for transport to a disposal facility. In addition, temporary sheeting and

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shoring will be used, as necessary, to protect utilities and adjacent structures where they are encountered.

Health and safety measures will be implemented during the proposed remediation to protect the public, onsite workers, and the environment in accordance with applicable federal, state, and local requirements. The health and safety measures will include, but will not be limited to, the installation of security fence to restrict access to the work area, community air monitoring, dust suppression, traffic control and the use of appropriate personal protective equipment.

Mechanical and manual earthwork equipment (e.g., backhoe buckets, hand shovels, non-disposable equipment, etc.) that are in contact with PCB-impacted soils will be decontaminated using double wash/rinse procedure in accordance with 40 CFR 761.79 (c)(2)(ii). Specifically, the following will be performed:

- A decontamination station will be erected on-site using polyethylene sheeting.
- First wash – the entire surface of the piece of equipment that was in contact in PCB-impacted soils will be covered with detergent solution (e.g., Alconox) and scrubbed to remove any residual dirt, dust or grime on the surface. Dry wet surfaces using clean disposable absorbent pads.
- First rinse – the entire surface will be rinsed with clean water, using a minimum of 1 gallon of clean water per square foot. Dry wet surfaces using clean disposable absorbent pads.
- Second wash – the entire surface of the piece of equipment that was in contact in PCB-impacted soils will be covered with an organic solvent (e.g., hexane) and scrubbed to remove any residual dirt, dust or grime on the surface. Dry wet surfaces using clean disposable absorbent pads.
- Second rinse - the entire surface will be wetted with clean rinse solvent. Dry wet surfaces using clean disposable absorbent pads.
- All decontamination fluids and pads will be collected at the point of use, containerized, and disposed of as PCB Remediation Waste.

The above decontamination procedures will be used during each project when moving from hazardous to non-hazardous soil areas and/or at the end of project prior to contractor demobilization. Barrier plastics or equipment that are exposed to PCB-impacted soils and not decontaminated will be disposed of as PCB Remediation Waste.

Soil Disposal

Excavated soil with PCB concentrations $\geq$ 1 ppm to < 50 ppm will be disposed as a PCB Remediation Waste at a licensed municipal solid waste disposal facility or at a Toxic Substances Control Act (TSCA) permitted facility, in accordance, with 40 CFR 761.61(a)(5)(i)(B)(2)(ii) and (a)(5)(v)(A).

Schedule

The proposed cleanup activities are anticipated to require approximately 6 weeks from Contractor mobilization to site restoration. All cleanup activities are expected to be completed during the summer of 2020.

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Written Certification

We hereby certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the New York City School Construction Authority offices (located at 30-30 Thompson Avenue, 2nd Floor, Long Island City, NY 11101), and are available for EPA inspection. We do not anticipate using alternate methods for chemical extraction and chemical analysis.

Chad Ondrusek
Sr. Director, IEH Division

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Your attention to this time-critical matter is greatly appreciated. Should you have any questions or require additional information, please do not hesitate to contact me at 718-752-5249.

Chad Ondrusek
Sr. Director, IEH Division

cc: Hassan Hussein (NYS DEC)
Terrell Esteen (NYCDEP)
Paromita Hore (NYC DOHMH)
Maureen Little (NYC DOHMH)
IEH File

Enclosure

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